

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

JOHN DOE 1, a minor, by and through his parent and natural guardian JANE DOE 1; JOHN DOE 2, a minor, by and through his parent and natural guardian JANE DOE 2; JOHN DOE 3, a minor, by and through his parent and natural guardian JANE DOE 3; on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

NORTH CAROLINA DEPARTMENT OF PUBLIC SAFETY; EDDIE M. BUFFALOE, JR., Secretary of the North Carolina Department of Public Safety, in his official capacity; WILLIAM L. LASSITER, Deputy Secretary of the Division of Juvenile Justice and Delinquency Prevention, in his official capacity; PETER BROWN, Facility Director of the Cabarrus Regional Juvenile Detention Center, in his official capacity,

Defendants.

No. 1:24-CV-00017-LCB-JLW

**NOTICE OF SPECIAL  
APPEARANCE**

Pursuant to Local Rule 83.1(d), please take notice of the special appearance of Donna O. Tillis of Nelson Mullins Riley & Scarborough LLP as counsel of record for Plaintiffs in the above-captioned matter.

Ms. Tillis certifies that she is an active member in good standing of the bar of the State of South Carolina. Ms. Tillis further certifies that she understands that by entering

an appearance, she submits to the disciplinary jurisdiction of the Court for any misconduct in connection with the above-captioned civil action for which she is specially appearing and that she will ensure that an attorney who is familiar with the case and has authority to control the litigation will be at all conferences, hearings, trials and other proceedings.

Ms. Tillis is appearing in the above-captioned civil action in association with Robert L. Lindholm of Nelson Mullins Riley & Scarborough LLP. Mr. Lindholm is an active member in good standing of the bar of this Court. Mr. Lindholm certifies that he will remain responsible to this Court for the conduct of the litigation and acknowledges that he must sign all pleadings and papers, except for certificates of service. Mr. Lindholm further certifies that he or a member of his firm admitted to this Court will be present during local hearings, pretrial conferences, potentially dispositive proceedings, and at trial.

This the 18th day of April, 2024.

*s/Donna O. Tillis*

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Donna O. Tillis (SC Bar. No. 101879)  
NELSON MULLINS RILEY &  
SCARBOROUGH LLP  
1320 Main Street / 17<sup>TH</sup> Floor  
Columbia, SC 29201  
(803) 799-2000  
donna.tillis@nelsonmullins.com

*s/Robert L. Lindholm*

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Robert L. Lindholm (N.C. Bar No. 52800)  
NELSON MULLINS RILEY &  
SCARBOROUGH, LLP  
301 South College Street, 23<sup>rd</sup> Floor  
Charlotte, NC 28202  
(704) 417-3000  
robert.lindholm@nelsonmullins.com  
Attorneys for Plaintiffs